

Koch, Kristine

From: Carl Stivers <cstivers@anchoragea.com>
Sent: Wednesday, March 12, 2014 2:19 PM
To: Humphrey, Chip; Koch, Kristine; Shephard, Burt
Cc: James McKenna; Bob Wyatt; John Toll; Amanda Shellenberger; Jennifer Woronets
Subject: Benthic Risk and Remediation/Dredge Areas

Chip – At yesterday's benthic call you requested LWG confirm that areas that have been remediated or otherwise removed (e.g., maintenance dredging) were excluded from Comprehensive Benthic Risk Areas. We have reviewed the benthic risk areas (and the SMAs in general).

The comprehensive benthic risk areas do not include the Gasco tar remediation area cap or the McCormick and Baxter remediation area (cap) but do include the T4 early action cap area. However, the overall SMA development excluded these areas because they were remediated and capped areas, even though the T4 cap was identified as part of a comprehensive benthic risk area in that prior analysis.

Dredge areas were handled in a different way. The FS database was filtered to remove any data points in areas and within subsurface horizons of those areas that have been dredged since those data were collected. All remaining data in the FS database were used throughout and around any dredge areas (whether those were dredged for maintenance or remediation purposes). These filtered data were used to determine inclusion or exclusion of areas within SMAs using standard FS evaluation methods as data in those areas dictated. Thus, if the filtered FS data indicated exceedances of FPM or LRM thresholds or other sufficient lines of evidence in dredge areas, these dredge areas would have been included in the CBRAs and SMAs. It would not be difficult to update the benthic risk areas to *a priori* exclude all areas that have been remediated or otherwise removed. However, we do not expect that approach would yield areas that differ substantially from the existing CBRAs.

Thanks.

Carl

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